
North Coast Regional Water Quality Control Board

January 8, 2013

Mr. David Reed
2485 Vera Drive
Santa Rosa, CA 95403

Dear Mr. Reed:

Subject: NOTICE OF VIOLATION FOR THE DAVID REED RESIDENTIAL CONSTRUCTION PROJECT STORMWATER PERMIT, 3471 HIDDEN HILLS DRIVE, SANTA ROSA, SONOMA COUNTY, WDID No. 149C353073

File: Lands of Reed Property, 3471 Hidden Hills Drive, Santa Rosa, Sonoma County

Your project is enrolled for coverage under and subject to the requirements of the Statewide General Permit for Discharges of Storm Water from Construction Activities (Construction General Permit). The Construction General Permit contains enforceable requirements intended to control the discharge of pollutants from construction projects. On Wednesday, December 26, 2012, Regional Water Quality Control Board (Regional Water Board) staff inspected the David Reed residential construction project (Lands of Reed project). Weather was clear at the time of the inspection, after several weeks of heavy rainfall. Staff noted areas of severe erosion in numerous places onsite, with direct evidence of sediment discharges to a small tributary to Mark West Creek. A drainage channel had been dug at the toe of a cutslope in the horse corral, which aided in eroding the hillside. Access road erosion was severe and worsening as runoff cut deeper and deeper gullies. Without immediate Storm Water Pollution Prevention Plan (SWPPP) updates and implementation of revised erosion and sediment control practices, subsequent storms will likely result in additional discharges of sediments from the site into waters of the State.

Sediment discharges can cause or contribute to violation of applicable water quality standards. The Construction General Permit requires facility operators to reduce or eliminate pollutants in storm water discharges and authorized non-storm water discharges through the development and implementation of best management practices (BMPs). These BMPs help to control pollutants using Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT).

The following pictures depict conditions observed by staff at several different locations at the Lands of Reed project.

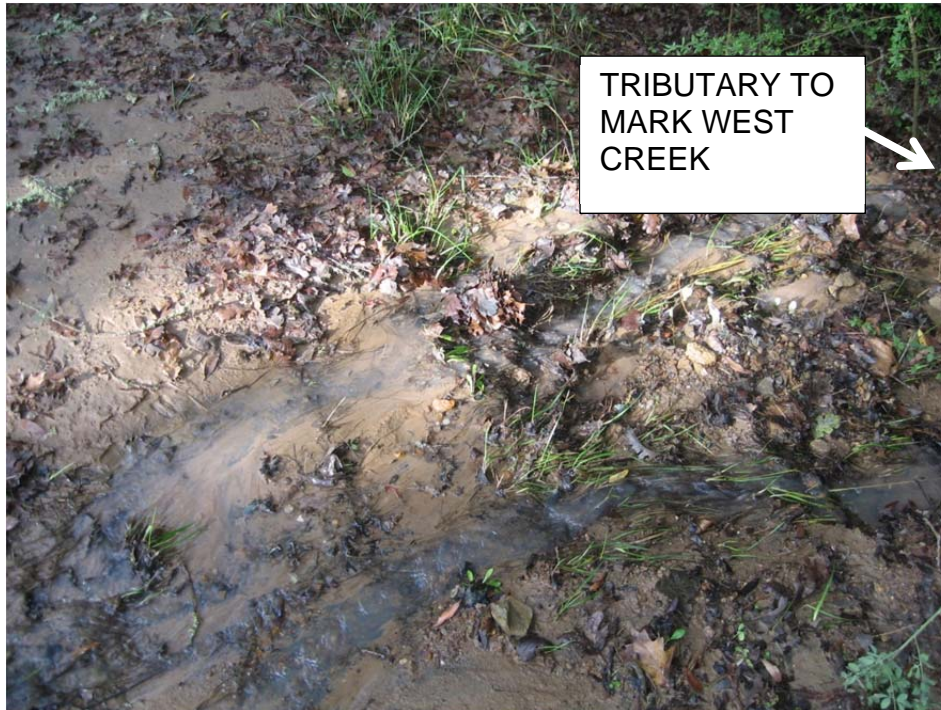


12/26/12 Exposed Soils and Eroding Hillside – 3471 Hidden Hills Drive
Photo by Paul Keiran, Regional Water Board Staff



CONSTRUCTED
DRAINAGE
DITCH

12/26/12 Drainage Ditch Cut into Toe of Hillside, Creating Erosion
Pathway, 3471 Hidden Hills Drive. Photo by Paul Keiran Regional Water
Board Staff



12/26/12 Evidence of Sediment Discharges to State Water, 3471 Hidden Hills Drive. Photo by Paul Keiran Regional Water Board Staff



12/26/12 Severe Gully Erosion on Access Road, 3471 Hidden Hills Drive. Photo by Paul Keiran Regional Water Board Staff

Compliance with your Construction General Permit includes ensuring that you have an adequate SWPPP onsite, and that you implement the provisions of the SWPPP through BAT and BCT. This includes directing all runoff generated onsite to receiving waters without eroding soil and transporting sediment.

Within 10 days of the date of this letter, you must submit an updated copy of your SWPPP to the State Water Resources Control Board; the updated SWPPP must fully describe measures implemented and/or proposed to be implemented to eliminate or significantly minimize the discharge of sediment laden stormwater runoff from the Lands of Reed project. Please include an implementation schedule for the site repairs to ensure that these measures are fully implemented. Failure to take these steps in a timely manner may result in further enforcement actions.

If you have any questions, please contact Paul Keiran of my staff at (707) 576-2753 or at paul.keiran@waterboards.ca.gov.

Sincerely,

Original Signed By

David F. Leland, PE
Watershed Protection Division Chief

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